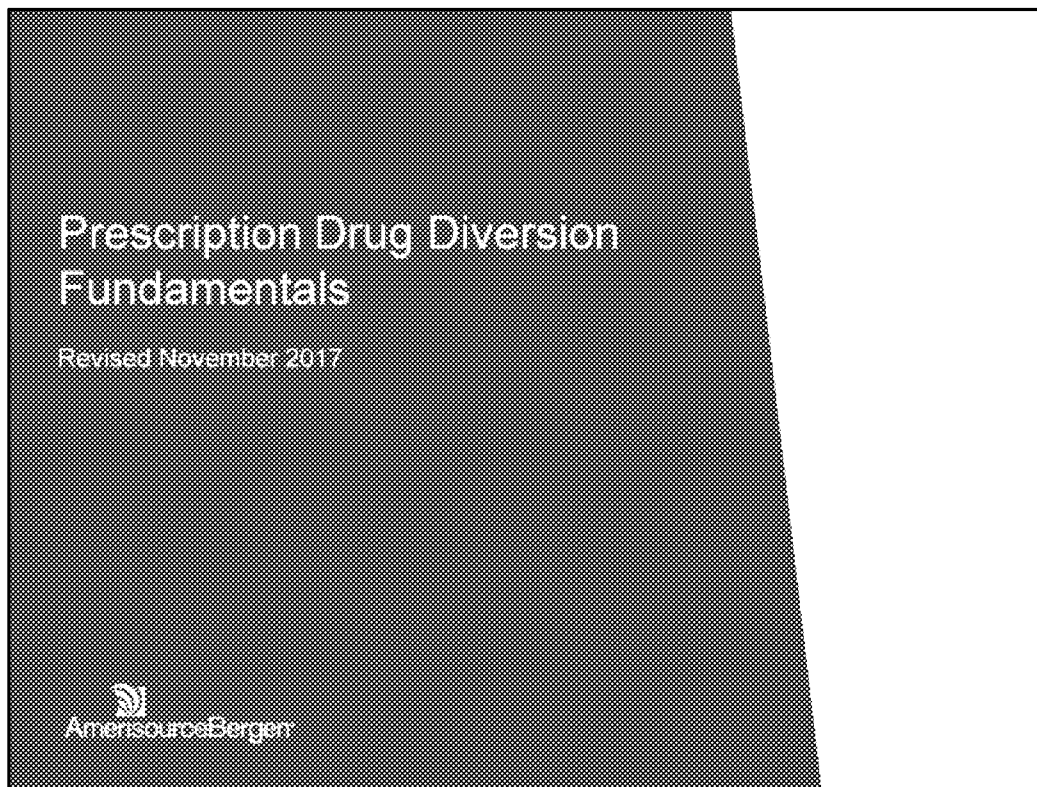


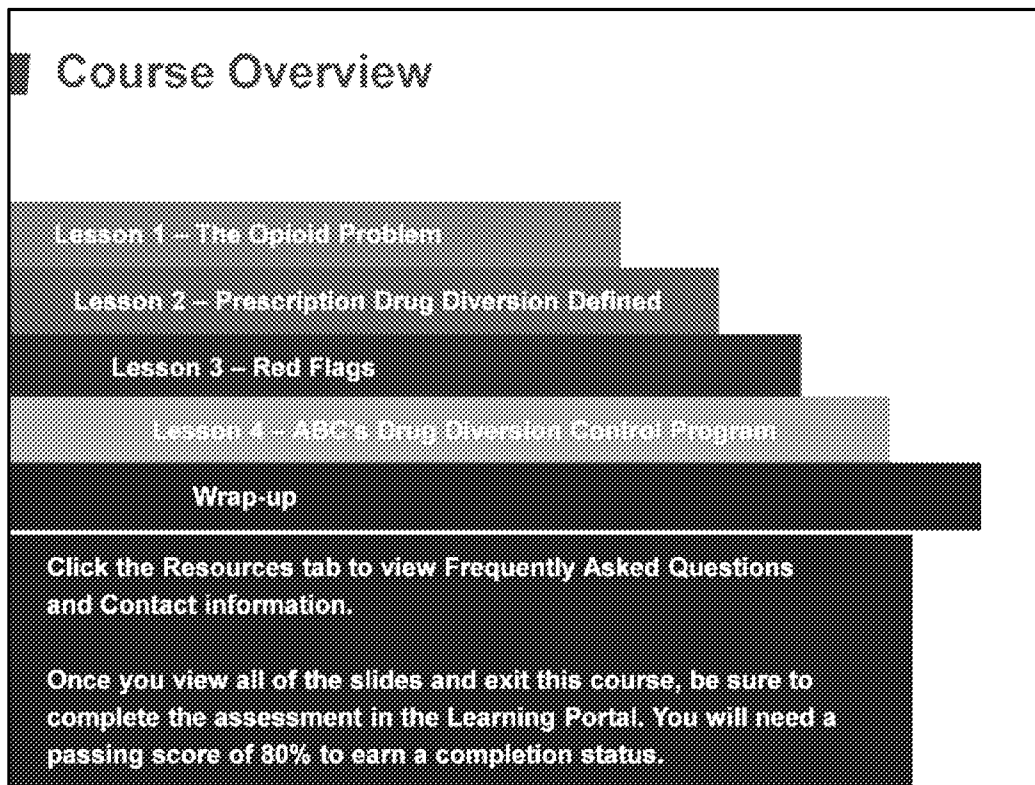
## EXHIBIT 39



**Time:** 15 seconds

**Narration:**

Welcome to the Prescription Drug Diversion Fundamentals e-learning course. This course was updated in November 2017 and includes the most updated statistics available at the time. Please note that all previous versions of this course are obsolete.



(Prod Note: animate bars in 1 at a time)

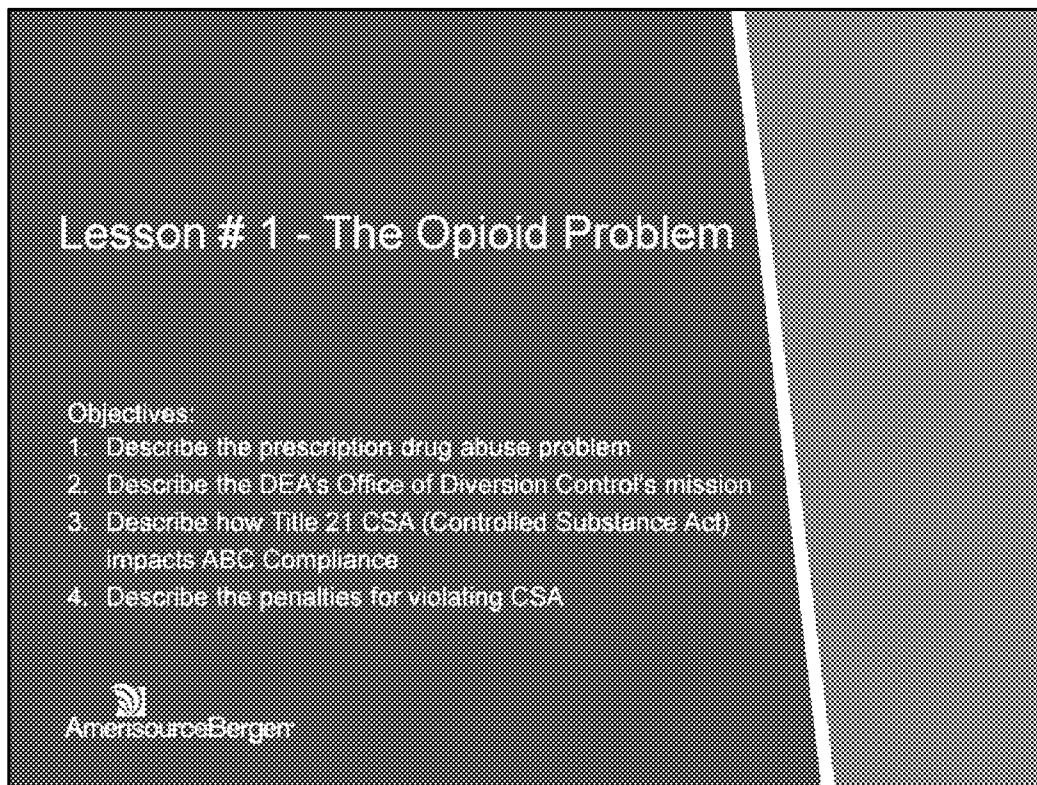
**Time:** 35 seconds

**Narration:**

Click the Resources tab to view Frequently Asked Questions and Contact information. Once you view all of the slides and exit this course, be sure to complete the assessment in the Learning Portal. You will need a passing score of 80% to earn a completion status.

This course has 4 lessons. We'll begin by talking about the opioid problem in the United States. Next, we'll define prescription drug diversion. Then, we'll identify common red flags about prescription drug diversion associated with retail pharmacies. We'll take a deep dive into the drug diversion control program at AmerisourceBergen (ABC). In the final section, we'll wrap up the course, provide additional resources and discuss expectations to make an impact.

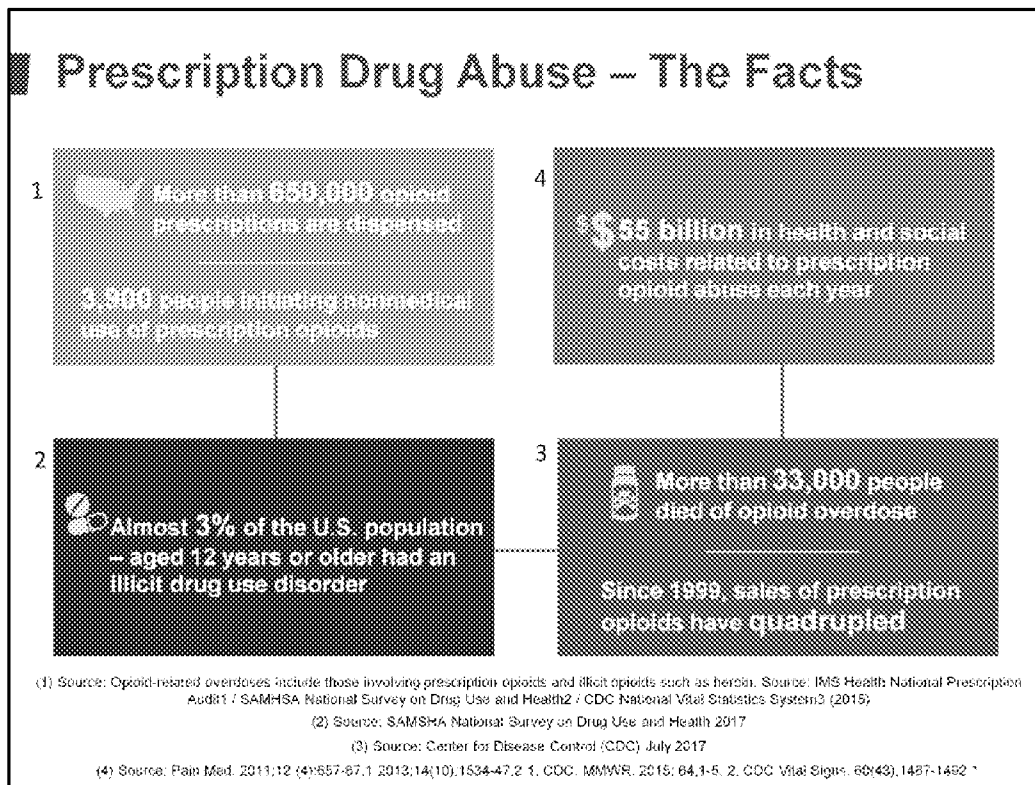
Now that you know what this course is about, let's take a closer look at the opioid problem in America.



**Time:** 28 seconds

**Narration:**

In understanding the opioid problem, we'll look at statistics that clearly demonstrate the severity of this issue within the U.S. We'll then familiarize ourselves with the DEA's Office of Diversion Control's mission to mitigate this problem. We'll learn about controls and procedures to guard against theft and diversion of controlled substances under Title 21 of the Controlled Substance Act. We'll also gain an understanding of the penalties for violating this act.



(Production note: each box animates / wipes in with associated audio and source information at the bottom, 1 at a time)

**Time:** 1 minute, 38 seconds

**Narration:** On an average day in the United States, more than 650,000 opioid prescriptions are dispensed with 3,900 people initiating nonmedical use of prescription opioids.

The National Survey on Drug Use and Health found that some 7.4 million people — almost 3% of the U.S. population — aged 12 years or older had an illicit drug use disorder. The most commonly misused medications were hydrocodone products, with almost 7 million of the 11.5 million naming brands such as *Vicodin* and *Lortab*. Oxycodone was misused by almost 4 million Americans.

In 2015, more than 33,000 people died of opioid overdose, with another 20,000 dying from other drugs. A recent federal study found that prescription painkillers are now more widely used than tobacco. Since 1999, sales of prescription opioids have quadrupled.

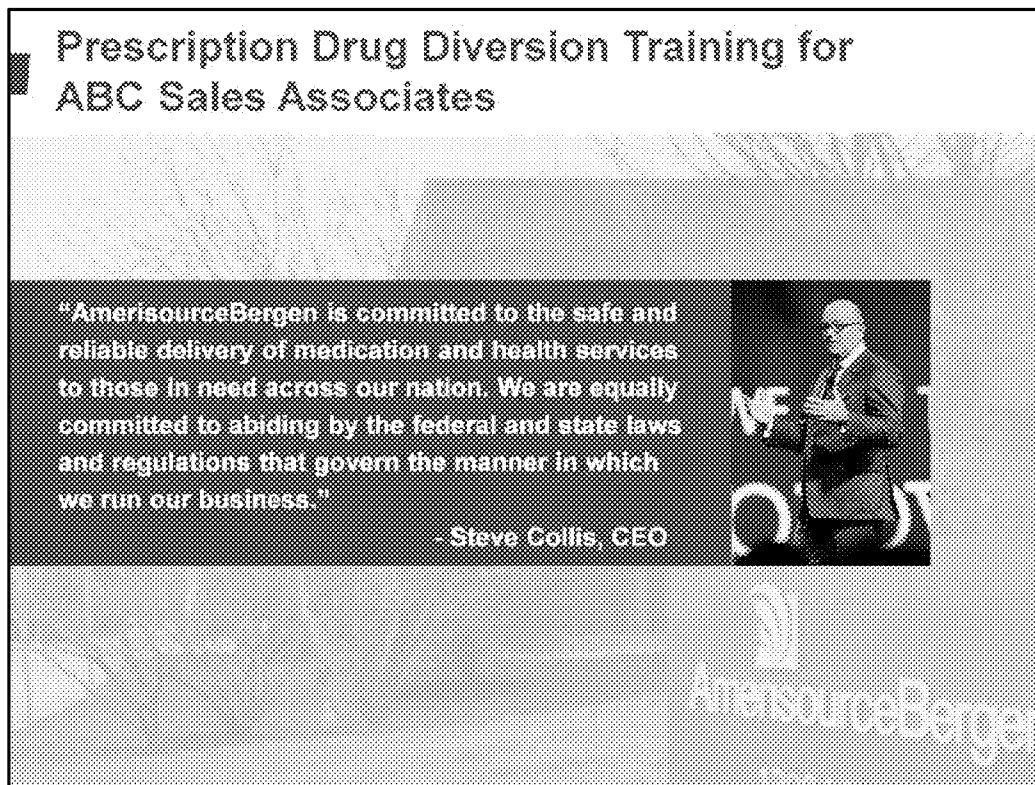
The economic impact of the opioid epidemic include: \$55 billion spent in health and social costs related to prescription opioid abuse each year. \$20 billion spent



in emergency department and inpatient care for opioid poisonings.

As you can see, the statistics overwhelmingly demonstrate that we have an opioid epidemic in the U.S., and tragically people are dying. Any discussion about drug diversion must begin with a current understanding of the tremendous prescription drug abuse problem we face as a nation.

We have a moral obligation to reduce the severity of this issue. And, at AmerisourceBergen, our duty extends beyond the moral obligation.



**Time:** 15 seconds

**Narration:** Our CEO Steve Collis stresses our commitment to safe and reliable delivery of medication and health services across our nation. It's critical that our operations remain in compliance with federal and state laws and regulations.

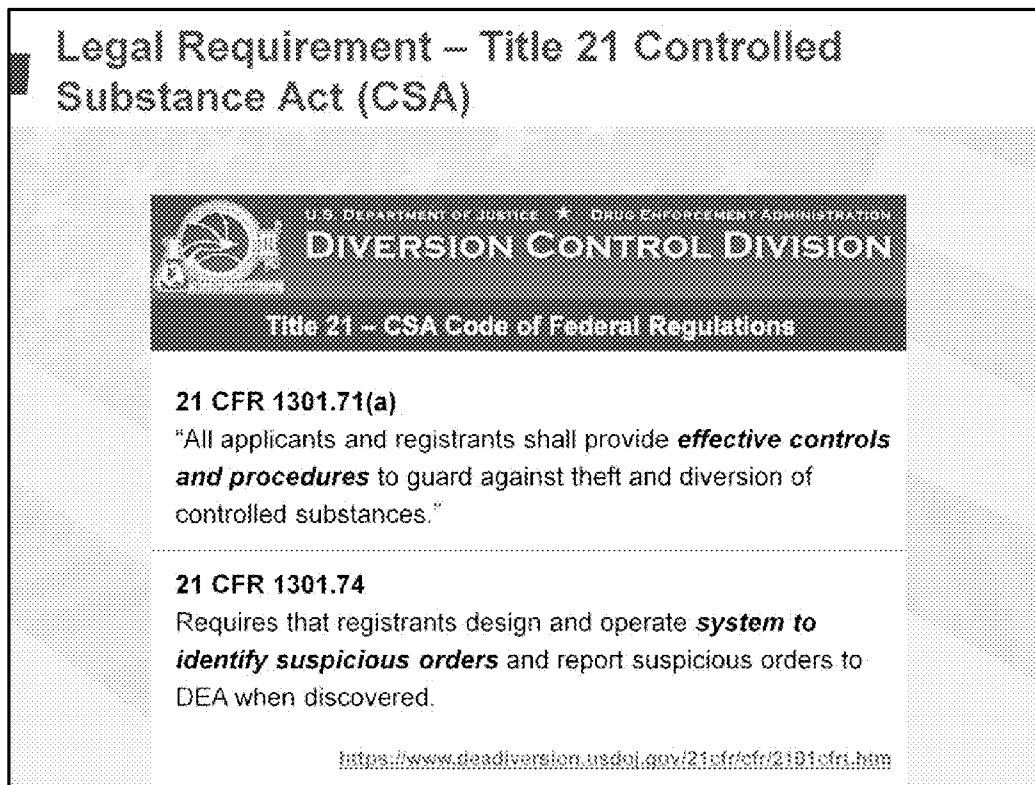


**Time:** 12 seconds

**Narration:** To help address our nation's drug abuse problem, the DEA's Office of Diversion Control was established with the mission to prevent, detect, and investigate the diversion of controlled pharmaceuticals.

(Prod Note: Hyperlink:  
<https://www.deadiversion.usdoj.gov/21cfr/cfr/2101cfrt.htm>)





(Prod note): animate text in as audio plays. Hyperlink:  
<https://www.deadiversion.usdoj.gov/21cfr/cfr/2101cfr.htm>  
Time: 45 seconds

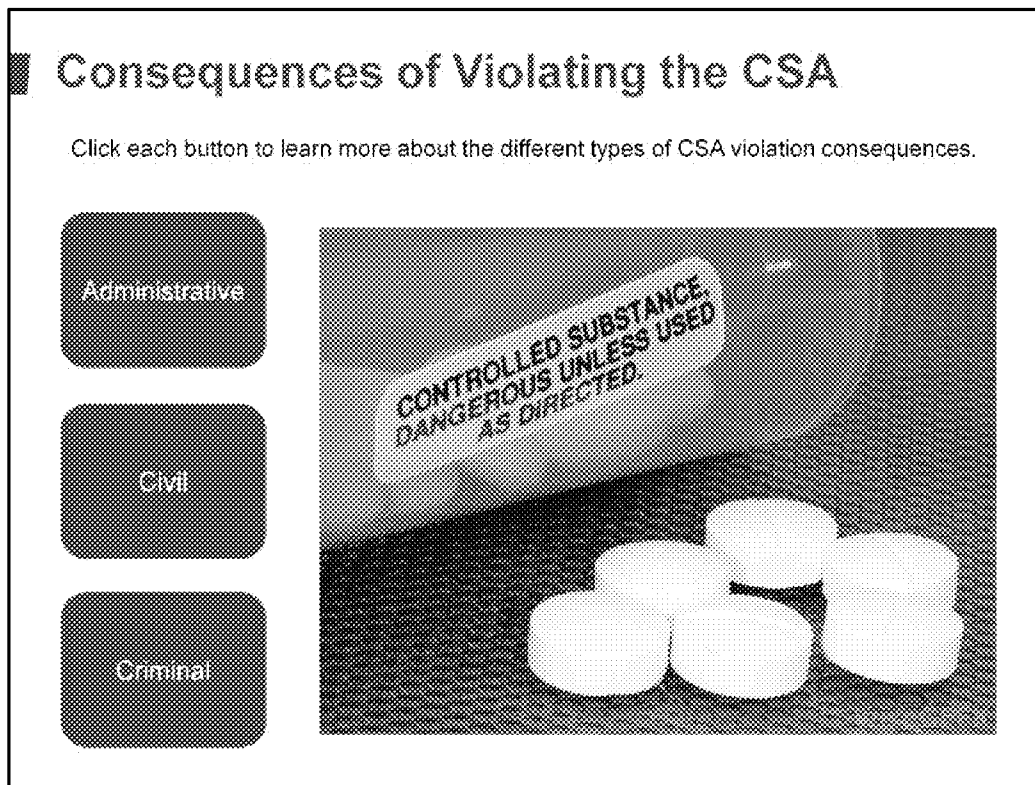
**Narration:**

AmerisourceBergen, as a wholesale drug distributor, is a DEA registrant and is legally bound by Federal law, specifically Title 21 of the Controlled Substance Act (CSA) and implementing regulations.

In part, the act requires that we must have effective controls and procedures to guard against theft and diversion of controlled substances, and a system to identify suspicious orders of controlled substances by our customers.

For us, that system is the Order Monitoring Program, or OMP, which is the cornerstone of the company's diversion control program. We'll dive into more details of the OMP in Lesson 4.

What would happen if AmerisourceBergen was not in compliance with the CSA?



(Prod note: Interaction: 3 button reveal (Administrative, Civil and Criminal buttons. No button selected yet). See next 3 screens for more details.

**Time:** 25 seconds

**Narration:**

All registrants, including AmerisourceBergen, operate in a highly regulated and "closed system". We'll talk more about closed systems in Lesson 2. As such, we are subject to the full range of Administrative, Civil and Criminal Actions for violation of the CSA and implementing regulations.

Click each button to learn more about the different types of CSA violation consequences.

## Consequences of Violating the CSA

Click each button to learn more about the different types of CSA violation consequences.


Administrative

Civil

Criminal

**Administrative:**

- Order to show cause
- Immediate suspension order



[It happened to ABC! Read the News Release](#)

(Prod note: Interaction: 3 button content reveal (Administrative, Civil and Criminal buttons; Administrative button selected

Hyperlink:

<http://www.amerisourcebergen.com/investor/phoenix.zhtml?c=61181&p=irol-newsArticle&ID=1044998>)

**Time:** 11 seconds

**Narration:** Administrative penalties for violating the CSA include: order to show causes or immediate suspension. It happened to us in the past! We need to eliminate the likelihood of this happening again. Click the link to read the news release.

## Consequences of Violating the CSA

Click each button to learn more about the different types of CSA violation consequences.


Administrative

Civil

Criminal

**Civil:**

- Fines: a \$10,000 per violation fine for each occurrence of drug diversion
- McKesson ordered to pay \$150 million in fines and to suspend sales of controlled substances



(Prod note: 3 button content reveal (Administrative, Civil and Criminal buttons; Civil button selected)

**Time:** 3 seconds

**Narration:** Civil penalties for violating the CSA include a \$10,000 per violation fine for each occurrence of drug diversion. Our competitor, McKesson was ordered to pay \$150 million in fines and to suspend sales of controlled substances from four distribution centers as a result of an opioid settlement.

## Consequences of Violating the CSA

Click each button to learn more about the different types of CSA violation consequences.


Administrative

Civil

**Criminal**

**Criminal:**

- Investigation that results in criminal prosecution of the organization and/or its members

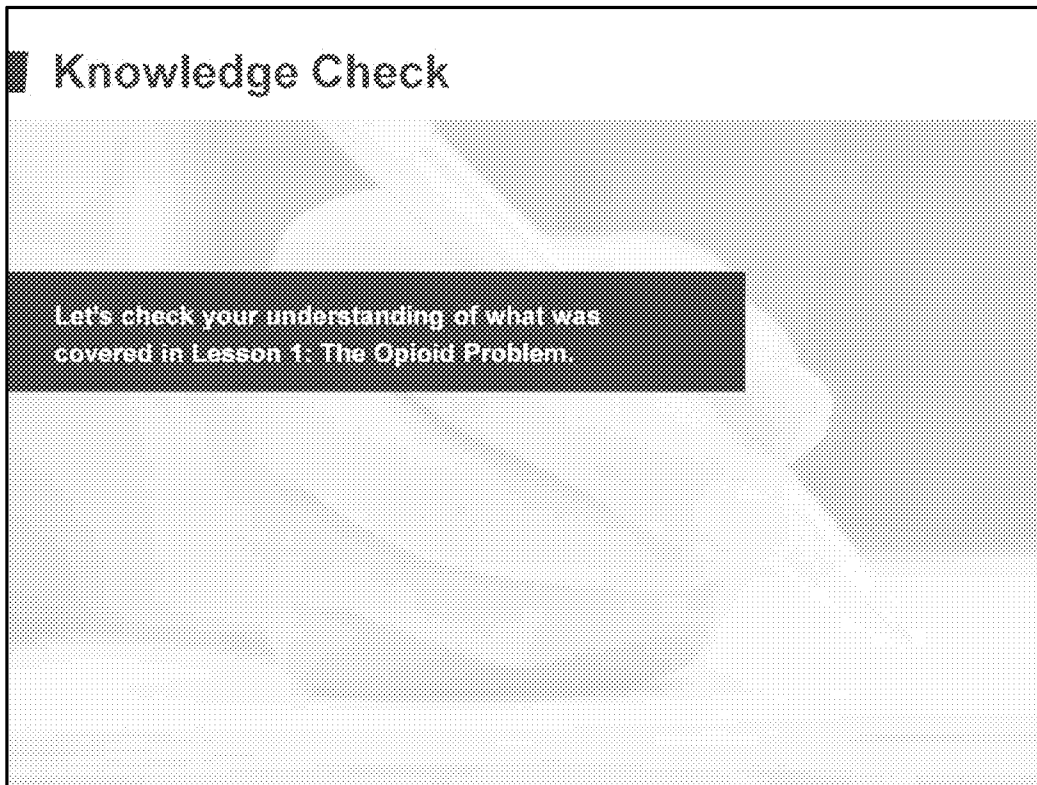


(Prod note: 3 button content reveal (Administrative, Civil and Criminal buttons; Criminal button selected))

**Time:** 6 seconds

**Narration:** Criminal penalties for violating the CSA may include prosecution of the organization and/or any of its members.





**Time:** 5 seconds

**Narration:** Let's check your understanding of what we covered in Lesson 1: The Opioid Problem.

What percentage of the U.S. population — aged 12 years or older had an illicit drug use disorder?

A. 1%

B. 3%

C. 4%

D. 5%

Source: SAMSHA National Survey on Drug Use and Health 2017.

**Time:** 10 seconds

**What is the mission of the DEA's Office of Diversion Control?**

A. To prevent, detect, and investigate the diversion of controlled pharmaceuticals and listed chemicals

B. To support, control, and block the diversion of controlled pharmaceuticals and listed chemicals

C. To risk, enforce, and punish the diversion of controlled pharmaceuticals and listed chemicals

D. To encourage, promote, and allow the diversion of controlled pharmaceuticals and listed chemicals

**Time: 10 seconds**

Violation of Title 21 of the Controlled Substance Act (CSA) or any of its implementing regulations by a DEA registrant may result in which of the following?

- A. Administrative Action, including suspension of registration
- B. Civil Fines
- C. Criminal Prosecution
- D. All of the above

**Time:** 10 seconds

True or False? AmerisourceBergen, a wholesale drug distributor, is a DEA registrant and is legally bound by Federal law, specifically Title 21 of the Controlled Substance Act (CSA) and its implementing regulations.

A. True  
B. False

**Time:** 10 seconds

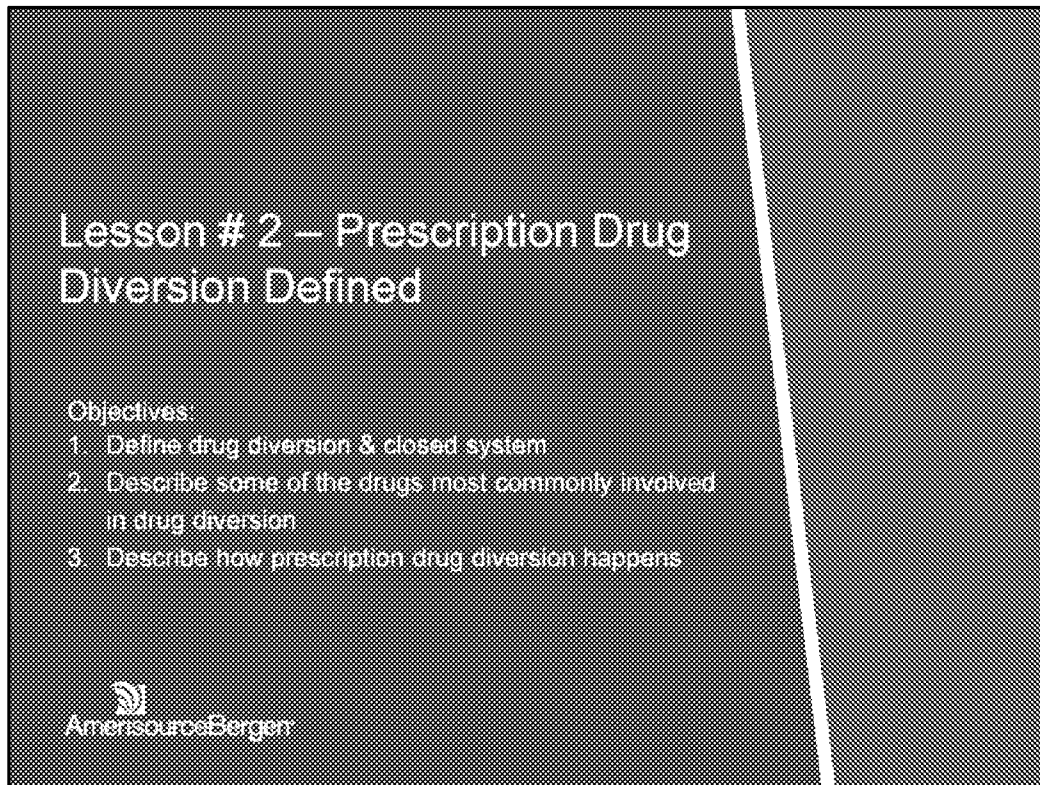


## Summary – Lesson 1: The Opioid Problem

- The United States has an opioid problem
  - On an average day in the U.S., more than 650,000 opioid prescriptions are dispensed with 3,900 people initiating nonmedical use of prescription opioids
  - Almost 3% of the U.S. population — aged 12 years or older had an illicit drug use disorder
  - In 2015, more than 33,000 people died of opioid overdose
- The mission of the DEA's Office of Diversion Control is to prevent, detect, and investigate the diversion of controlled pharmaceuticals and listed chemicals
- Title 21 –Controlled Substance Act (CSA), which AmerisourceBergen must follow, requires us to have effective controls and procedures in place to prevent diversion and requires systems to identify suspicious orders
- Consequences for violating the CSA include administrative, civil, and criminal penalties

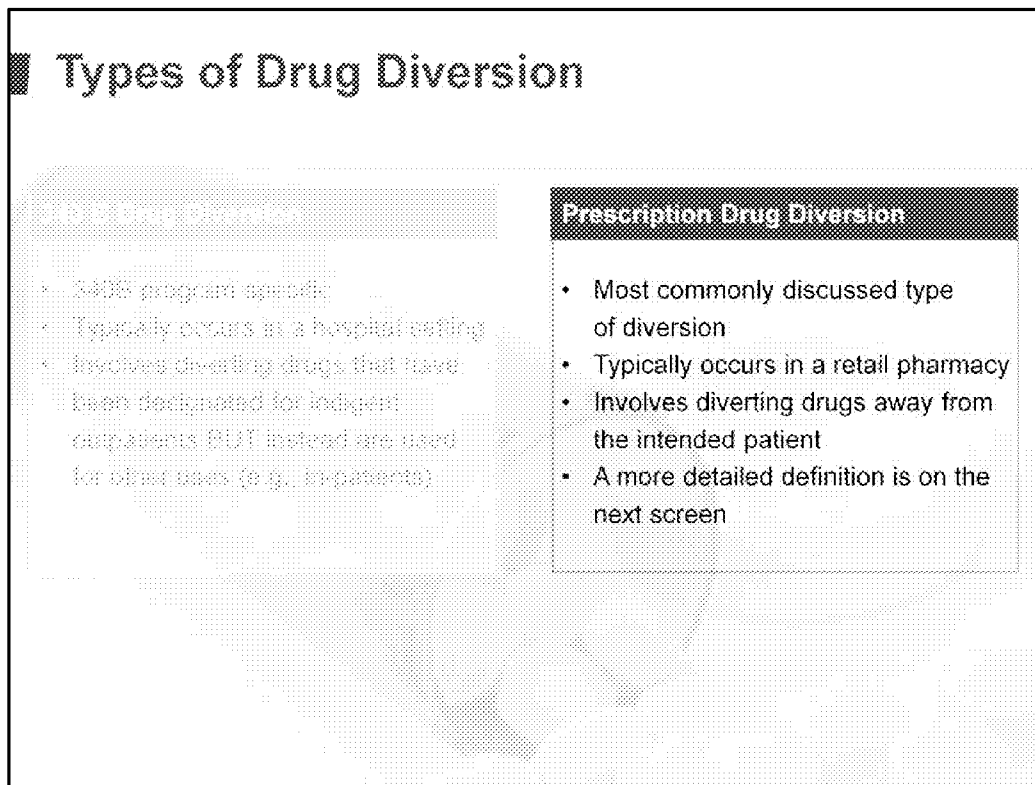
**Time:** 11 seconds

**Narration:** This concludes Lesson 1: The Opioid Problem. Read over the summary items. Once you are finished, click Next to move on to Lesson 2 – Prescription Drug Diversion Defined.



**Time:** 11 seconds

**Narration:** In Lesson 2, we'll define prescription drug diversion and where this can occur in the distribution process. We'll describe the most commonly diverted prescription drugs and explore different ways drug diversion can happen.



(Prod note: fade 340B out when mentioning not covered)

**Time:** 34 seconds

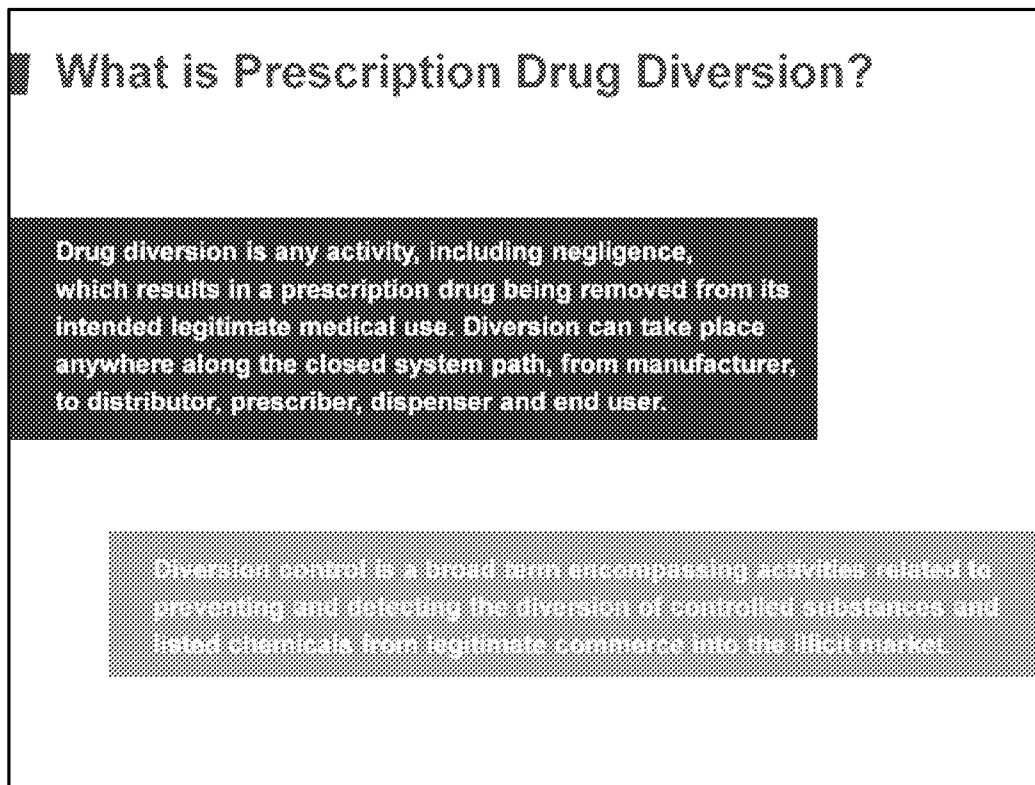
**Narration:**

There are at least two types of drug diversion commonly discussed, including 340B drug diversion and prescription drug diversion.

The 340B program was developed to provide discounted or free drugs to help healthcare facilities support indigent patients. This training does not cover 340B drug diversion. See ABC's learning portal for training on the 340B program and 340B drug diversion.

This course will focus on prescription drug diversion. Let's move on to learn more about prescription drug diversion.

(Prod note: fade 340B out when mentioning not covered)



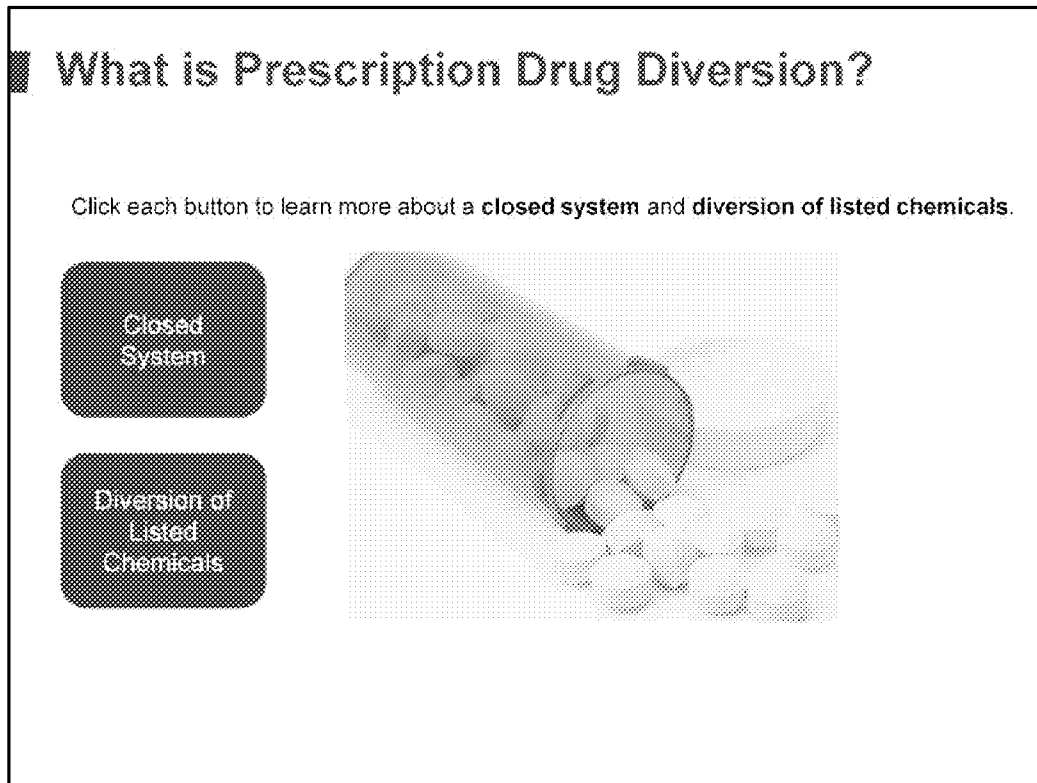
(Prod note: Boxes wipe in 1 at a time, synched to audio)

**Time:** 29 seconds

**Narration:**

Drug diversion is any activity, including negligence, which results in a prescription drug being removed from its intended legitimate medical use. Diversion can take place anywhere along the closed system path, from manufacturer, to distributor, prescriber, dispenser and end user.

Diversion control encompasses activities related to preventing and detecting the diversion of controlled substances and listed chemicals from legitimate commerce into the illicit market.



(Prod Note: **Interaction:** 2 button reveal (Closed System and Listed Chemical buttons); combined with slides 22 and 23

**Time:** 5 seconds

**Narration:**

Click each button to learn more about a closed system and diversion of listed chemicals.



## ■ What is Prescription Drug Diversion?

Click each button to learn more about a **closed system** and **diversion of listed chemicals**.

**Closed System**

Under the framework of the CSA, the DEA is responsible for ensuring that all controlled substance transactions take place within the "closed system" of distribution established by Congress. Under this "closed system," all legitimate handlers of controlled substances – manufacturers, distributors, physicians, pharmacies, and researchers – must be registered with the DEA and maintain strict accounting for all distributions.

Source: DEA's website  
<https://www.deadiversion.usdoj.gov/substancs/publications/section1.htm>

**Diversion of Listed Chemicals**

(Prod Note: **Interaction:** 2 button reveal (Closed System button clicked) combined with slides 21 and 23

**Time:** 16 seconds

**Narration:**

Under a closed system, all legitimate handlers of controlled substances – manufacturers, distributors, physicians, pharmacies, and researchers – must be registered with the DEA and maintain strict accounting for all distributions.

## ■ What is Prescription Drug Diversion?

Click each button to learn more about a **closed system** and **diversion of listed chemicals**.

**Closed System**

**Diversion of Listed Chemicals**

**Diversion of Listed Chemicals**

"In addition to other drugs of abuse, today's illicit drug market offers an assortment of purely synthetic drugs that are abused by both young and old alike. These drugs are often illegally manufactured or synthesized in clandestine laboratories that require chemicals to synthesize, extract, and purify these drugs. Frequently, these clandestine laboratories pose significant public health and safety issues. Therefore, the DEA has long recognized the need to monitor and control these chemicals."

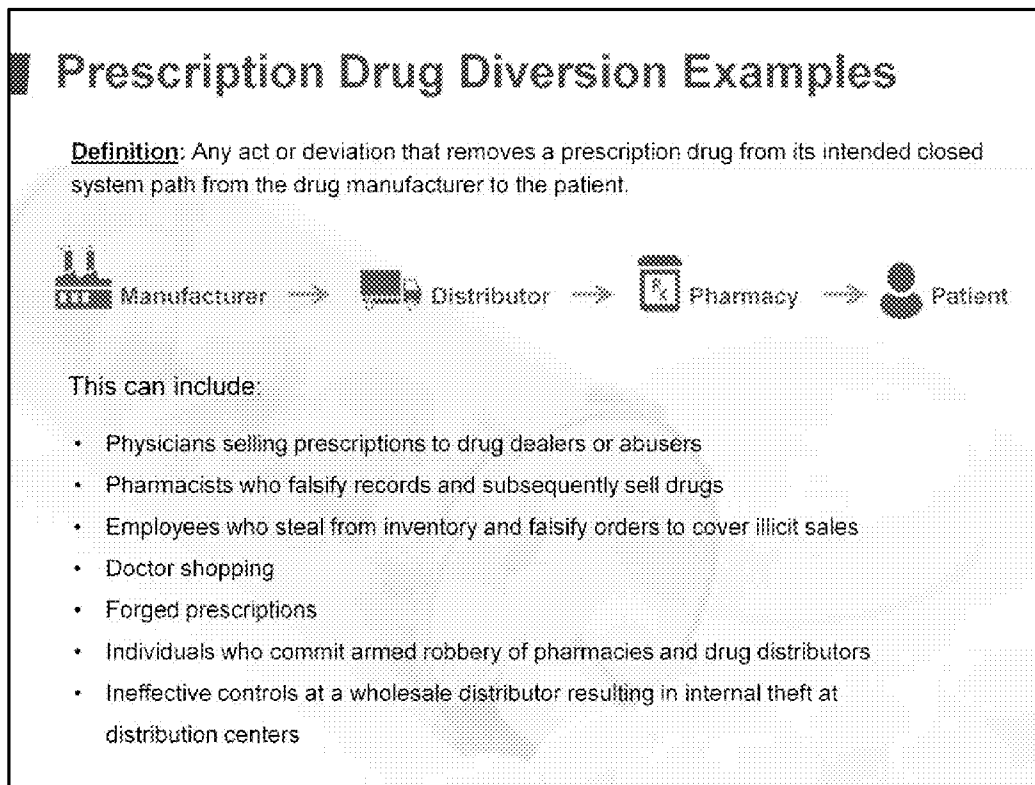
Source: DEA's website  
[https://www.deadiversion.org/dil/awards\\_desc/index.htm](https://www.deadiversion.org/dil/awards_desc/index.htm)

(Prod Note: **Interaction:** 2 button reveal (Closed System and Listed Chemical buttons; Listed Chemicals button selected); combined with slides 21 and 22)

**Time:** 26 seconds

**Narration:**

Today's illicit drug market offers an assortment of purely synthetic drugs that may be abused including methamphetamine. Often, these drugs are illegally manufactured in clandestine laboratories that require chemicals to synthesize, extract, and purify these drugs. Frequently, these laboratories pose significant public health and safety issues. Therefore, the DEA has long recognized the need to monitor and control these chemicals.



(Prod note: animate bulleted list in with audio)

**Time:** 48 seconds

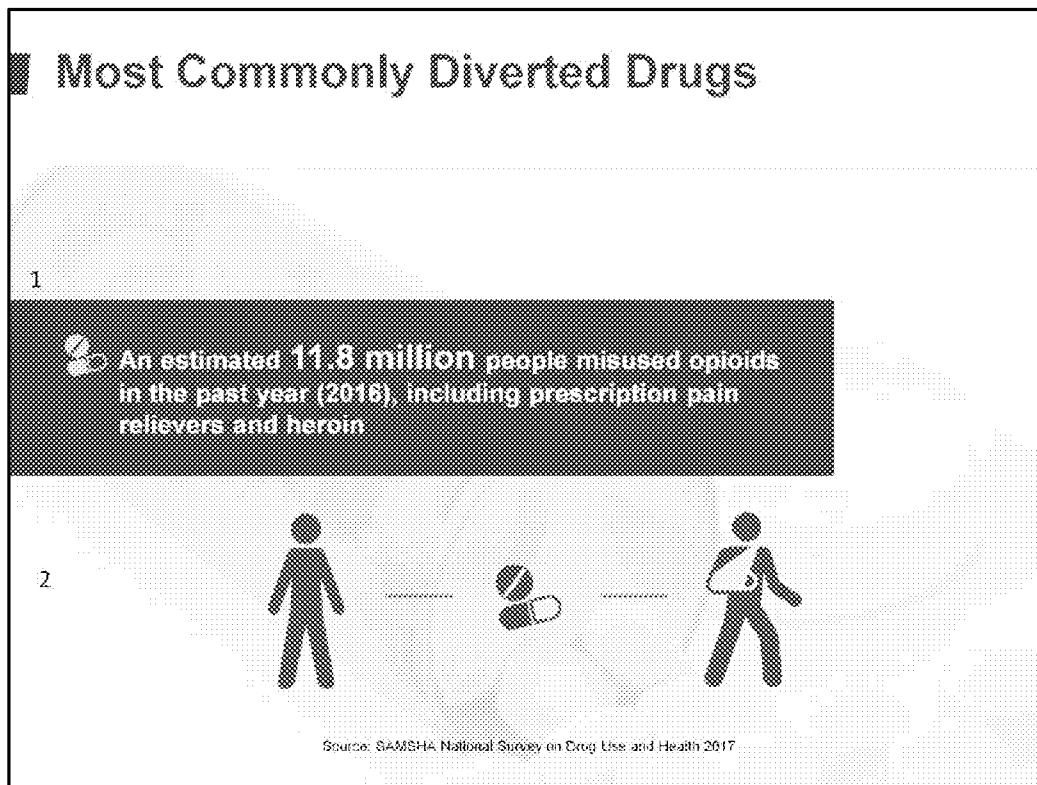
**Narration:**

As discussed, drug diversion can take place anywhere along the closed system path, from manufacturer, to distributor, pharmacy, and patient.

Prescription drug diversion can include:

- Physicians selling prescriptions to drug dealers or abusers
- Pharmacists who falsify records and subsequently sell drugs
- Employees who steal from inventory and falsify orders to cover illicit sales
- Doctor shopping
- Forged prescriptions
- Individuals who commit armed robbery of pharmacies and drug distributors
- Ineffective controls at a wholesale distributor resulting in internal theft at distribution centers

Drug diversion is dangerous. Certain types of drugs are more likely to be diverted because of misuse.



(Prod note: fade out statistics (1) and have (2) person icon with pills and then injury icon lines to each, and have slide 26 images and labels fade in with audio)







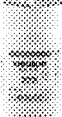



**Time:** 31 seconds

**Narration:**

One of the biggest threats for drug diversion are opioids or painkillers. An estimated 11.8 million people misused opioids in 2016, including prescription pain relievers and heroin. Unfortunately, these drugs have very addictive qualities. Imagine someone who was prescribed hydrocodone following an injury. They may become reliant on the medication and continue to use the drug long after the legitimate medical need has passed. This is just one example of how drug diversion can take place.

## ■ Most Commonly Diverted Drugs

Misuse of painkillers represents 60-75%\* of the overall problem of prescription drug abuse:

				
Hydrocodone combo	Carisoprodol	Promethazine with Codeine syrup	Oxymorphone	Methadone
				
Fentanyl	Alprazolam 2mg	Oxycodone (15mg & 30 mg)	Adderall	Hydromorphone

\*Percentage varies on different studies

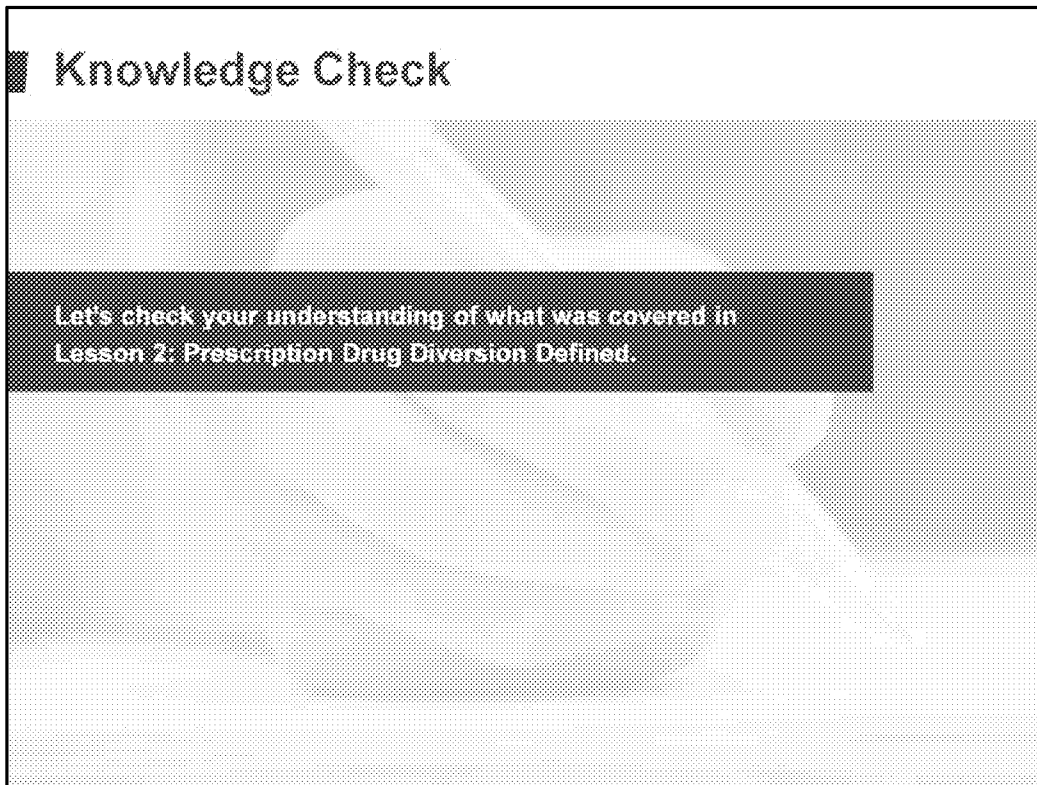
(Prod note: This slide to be combined with 25: / images and text fades in after slide 25's text and graphics)

**Time:** 18 seconds

**Narration:**

Misuse of painkillers represents 60-75% of the overall problem of prescription drug abuse. Hydrocodone, Carisoprodol, Promethazine with codeine syrup, and Oxymorphone are some of the most commonly diverted drugs. Familiarize yourself with these.





**Time:** 6 seconds

**Narration:** Let's check your understanding of what we covered in Lesson 2: Prescription Drug Diversion Defined.

**■ What does prescription drug diversion mean?**

- A. Drug diversion is any activity, including negligence, which results in a prescription drug being removed from its intended legitimate medical use.
- B. During a drug shortage, re-allocating drugs from one pharmacy to a another who's willing to pay more
- C. Changing the type of drug distribution from one form of delivery to another (e.g., truck shipment to air delivery)

**Time: 10 seconds**

**In the context of prescription drug diversion, what does “closed system” mean?**

A. A drug distribution system that will not accept any additional controlled substances entries because of throughput restrictions (e.g., time to get drugs to patients is too long)

B. A drug distribution system that has been shut down by the DEA due to a severe CSA violation

C. A drug distribution system that only allows FDA-approved pharmaceuticals be distributed

D. A drug distribution system whereby any handlers of controlled substances are registered with the DEA and maintains strict accounting for all distributions

**Time: 10 seconds**

**Which of the following would constitute a form of prescription drug diversion? Select all that apply.**

- ☐ A. Theft of controlled substances
- ☐ B. Physicians selling drugs to drug dealers or abusers
- ☐ C. Filling an otherwise valid prescription on Sundays
- ☐ D. Forged prescriptions
- ☐ E. Doctor shopping

**Time: 10 seconds**

**Which one of the following categories of prescription drugs gets abused the most?**

A. Inhalants

B. Tranquilizers

C. Opioids/Painkillers

D. Stimulants

**Time: 10 seconds**

## Summary – Lesson 2: Prescription Drug Diversion Defined

- Prescription drug diversion can be defined as any act or deviation that removes a prescription drug from its intended path from the manufacturer to the patient
- Different types of diversion include:
  - Physicians selling prescriptions to drug dealers or abusers.
  - Pharmacists who falsify records and subsequently sell drugs.
  - Employees who steal from inventory.
  - Doctor shopping.
  - Forged prescriptions.
  - Or individuals who commit armed robbery
- The biggest threat for diversion are opioids/painkillers

**Time:** 10 seconds

**Narration:** This concludes Lesson 2 - Prescription Drug Diversion Defined. Read over the summary items. Once you are finished, click Next to move on to Lesson 3 – Red Flags.





**Time:** 11 seconds

**Narration:** We'll identify common red flags about prescription drug diversion associated with retail pharmacies. Let's begin with a scenario and observe what's taking place there.

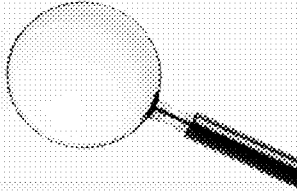
## ■ Observation Scenario

You're an AmerisourceBergen retail sales associate.

It's Thursday morning and you jump into your car, check your schedule, and head off to your first customer, Acme\* Pharmacy.

Lately, you've had an uneasy feeling about the Acme Pharmacy. Over the past 2 months their pharmacy revenue has spiked more than expected.

**As you arrive at the Acme Pharmacy, you notice...**



\*Acme Pharmacy is not a real pharmacy.

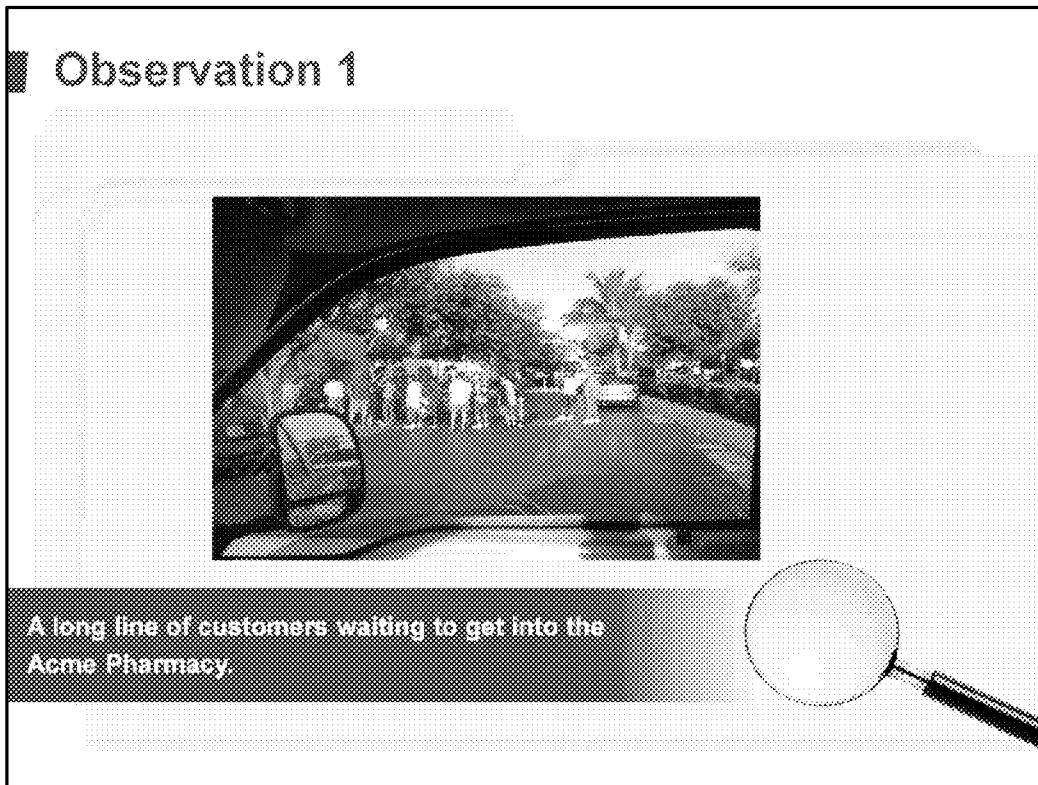
(Prod note: animate magnifying glass with text in. Combine this slide with #s35-38, text and magnifying glass appear with audio)

**Time:** 23 seconds

**Narration:** You're an AmerisourceBergen retail sales associate. It's Thursday morning and you jump into your car, check your schedule, and head off to your first customer, Acme\* Pharmacy.

Lately, you've had an uneasy feeling about the Acme Pharmacy. Over the past 2 months their pharmacy revenue has spiked more than expected.

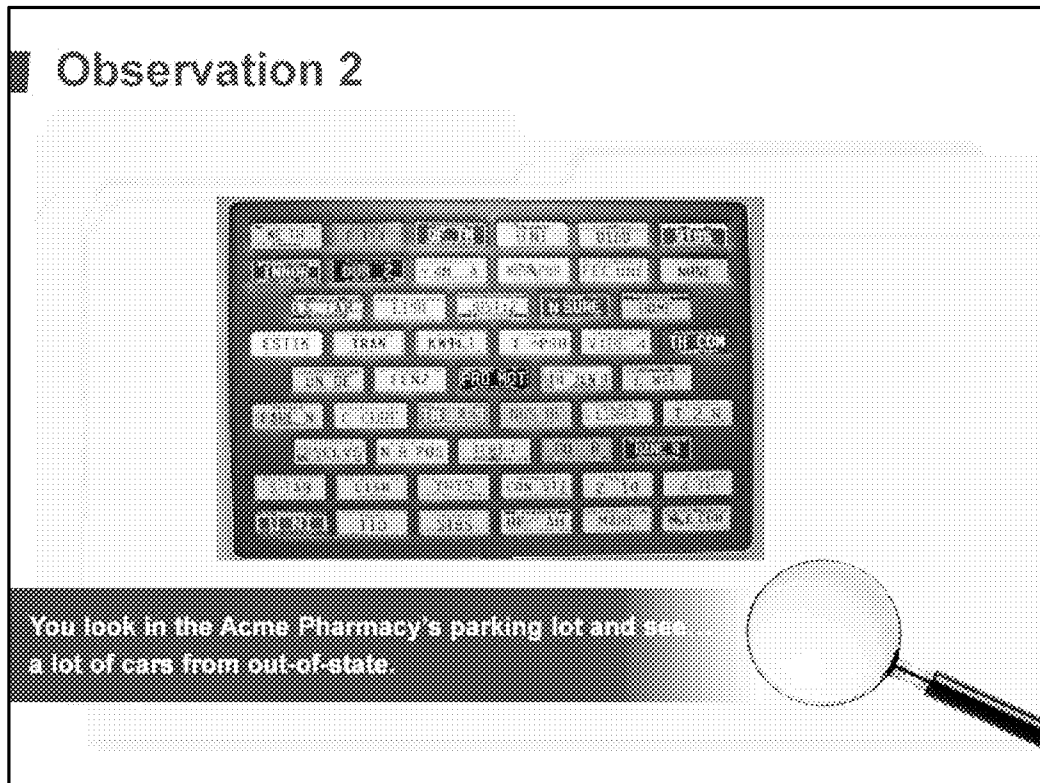
As you arrive at the Acme Pharmacy, you notice...



(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

**Time:** 5 seconds

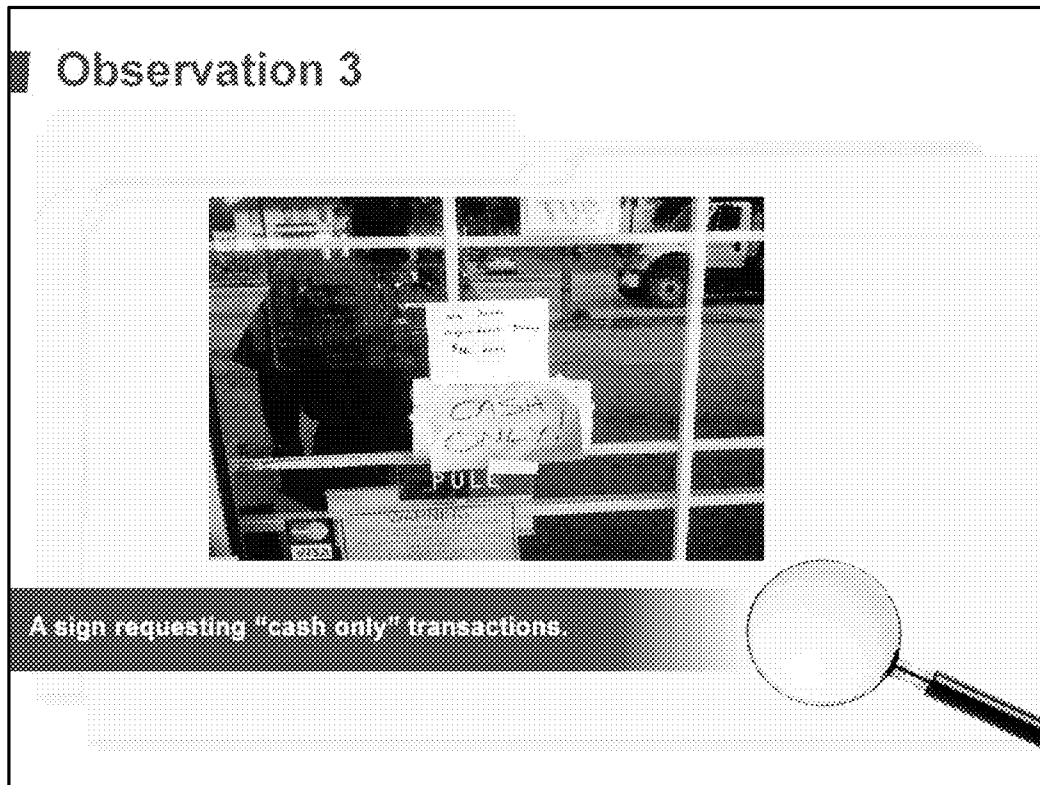
**Narration:** A long line of customers waiting to get into the Acme Pharmacy.



(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

**Time:** 6 seconds

**Narration:** You look in the Acme Pharmacy's parking lot and see...a lot of cars from out-of-state.

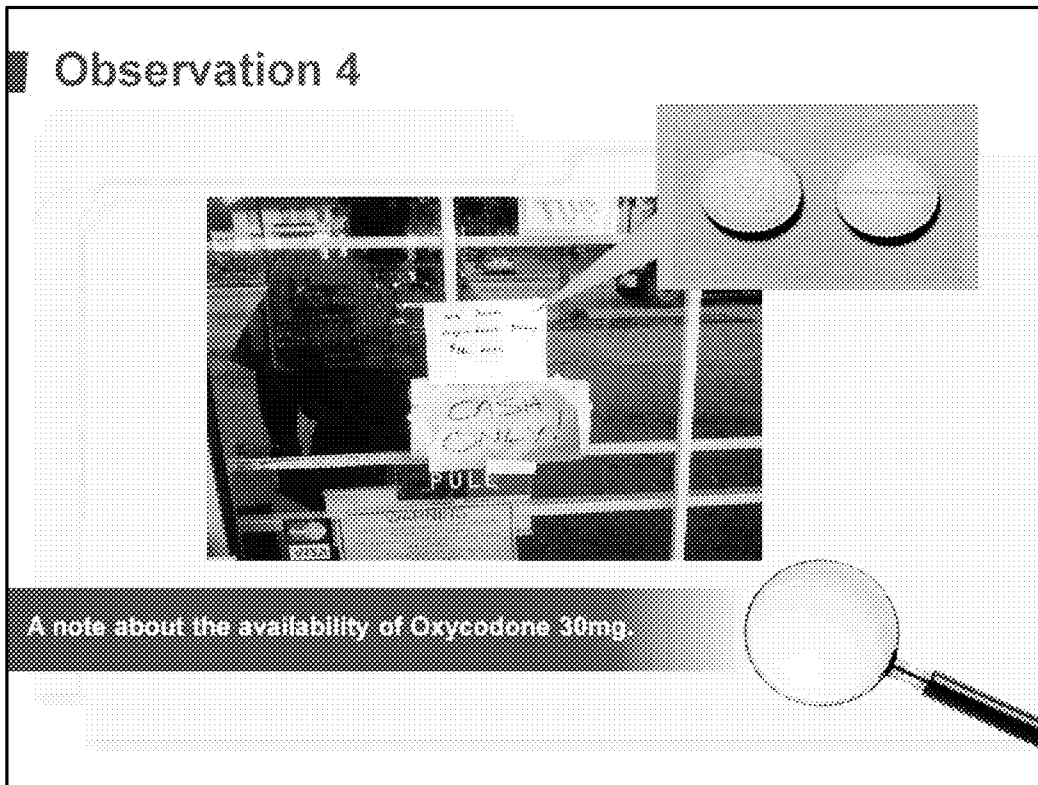


(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

**Time:** 4 seconds

**Narration:** A sign requesting "cash only" transactions in the pharmacy window.



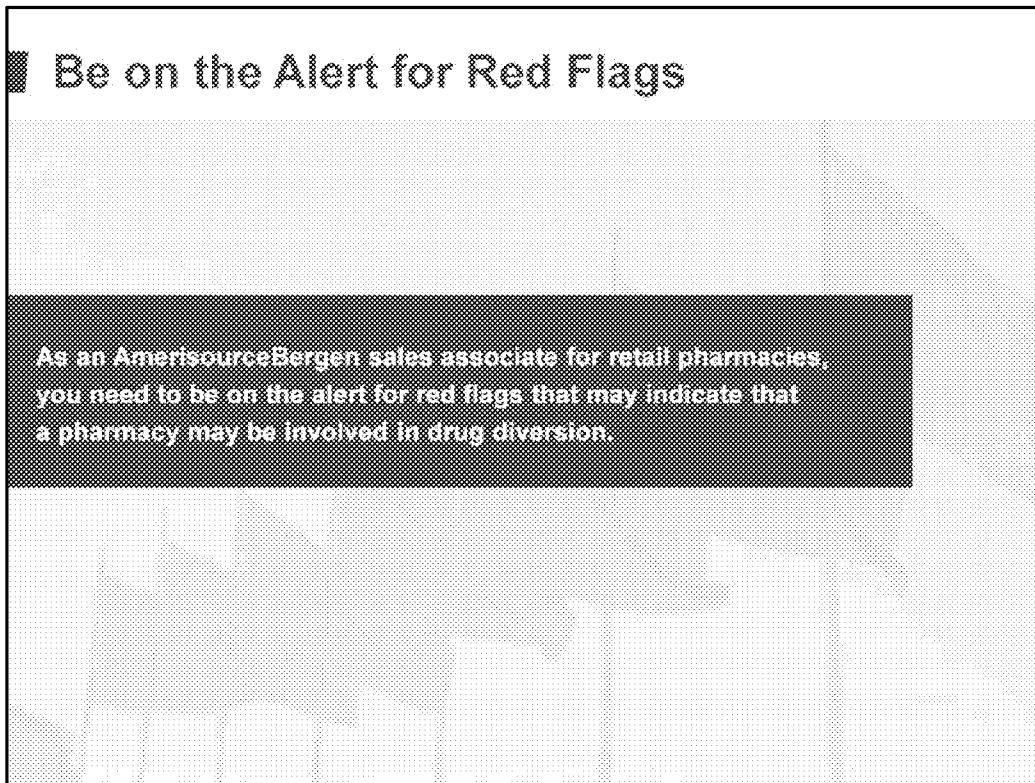


(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

**Time:** 5 seconds

**Narration:** Along with a note about the availability of Oxycodone 30mg.





**Time:** 19 seconds

**Narration:** Some of those observations may be red flags. As an AmerisourceBergen sales associate for retail pharmacies, you need to be on the alert for red flags that may indicate that a pharmacy may be involved in drug diversion.

Let's see if you're familiar with some of the most common red flags associated with drug diversion.

True or False? Individuals or groups loitering inside and outside of a pharmacy are both red flags that should be reported to Corporate Security and Regulatory Affairs (CSRA), indicating that there is an increased chance of drug diversion taking place within a retail pharmacy.

A. True  
B. False

**Time: 10 seconds**

True or False? Vehicles bearing out-of-state license plates in the pharmacy parking lot is a red flag that should be reported to Corporate Security and Regulatory Affairs (CSRA) indicating that there is an increased chance of drug diversion taking place within a retail pharmacy.

☐ A. True

☐ B. False

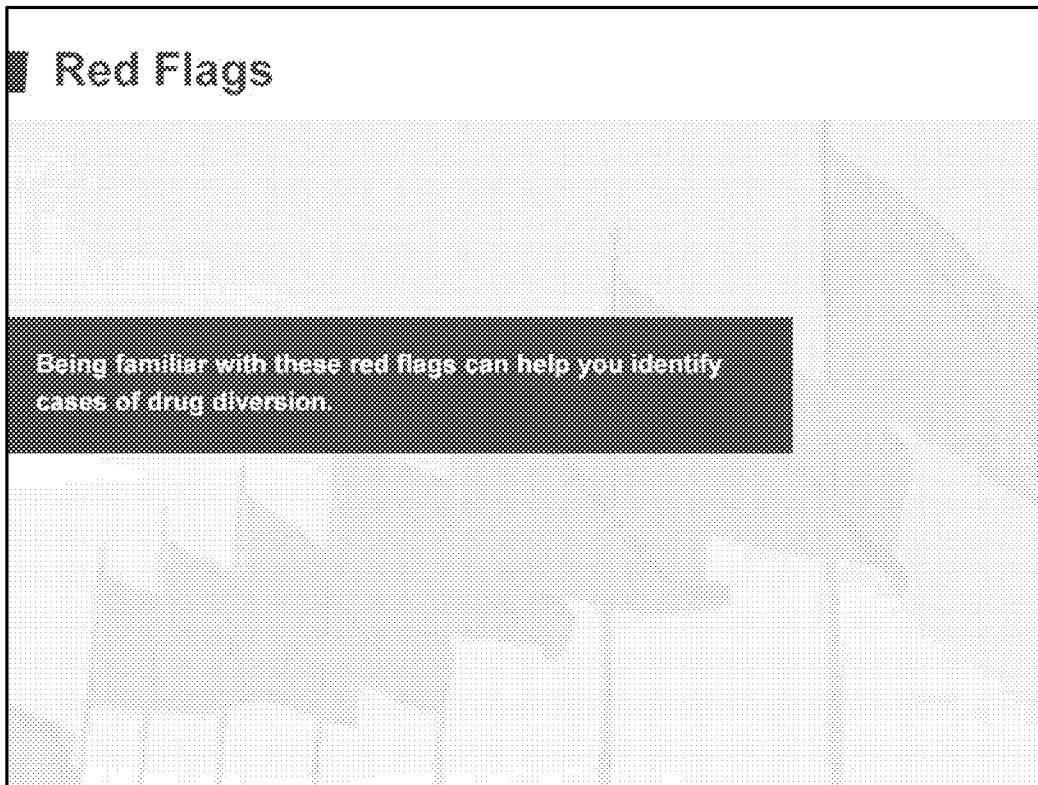
**Time: 10 seconds**

True or False? Having a high number of prescription drug sales early Saturday mornings (e.g., 8:30am – 10:00am) is a red flag indicating that there is an increased chance of drug diversion taking place within a retail pharmacy.

A. True

B. False

**Time: 10 seconds**



(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

**Time:** 9 seconds

**Narration:** Being familiar with these red flags can help you identify cases of drug diversion. Let's look at these common red flags in a little more detail.

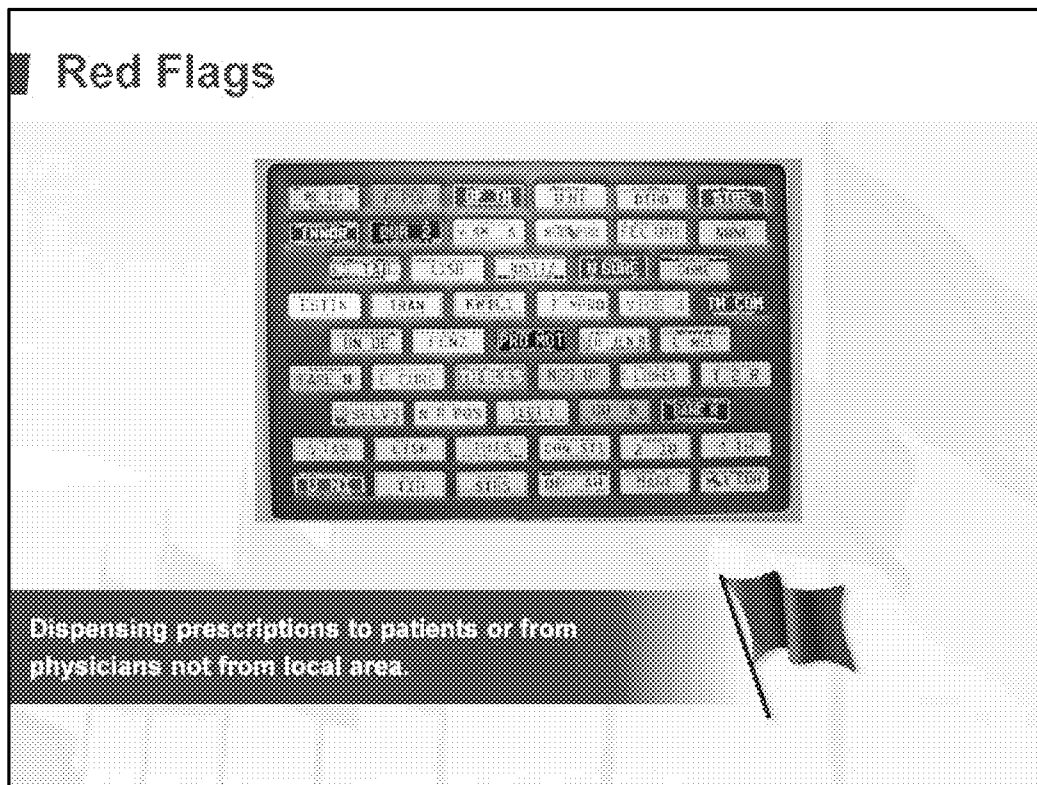


(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

**Time:** 34 seconds

**Narration:** Recall your first observation was long lines of patients standing outside the pharmacy. One of the criticisms that the Government has levied upon the industry is that if we had just visited certain problem pharmacies and observed the activities, that they would have been so far out of the norm, we would or should have known that something wrong was happening.

Generally speaking, you shouldn't see people loitering outside of the pharmacy, either standing or sitting in vehicles with multiple passengers. Problem pharmacies attract problem clients, because word spreads quickly.

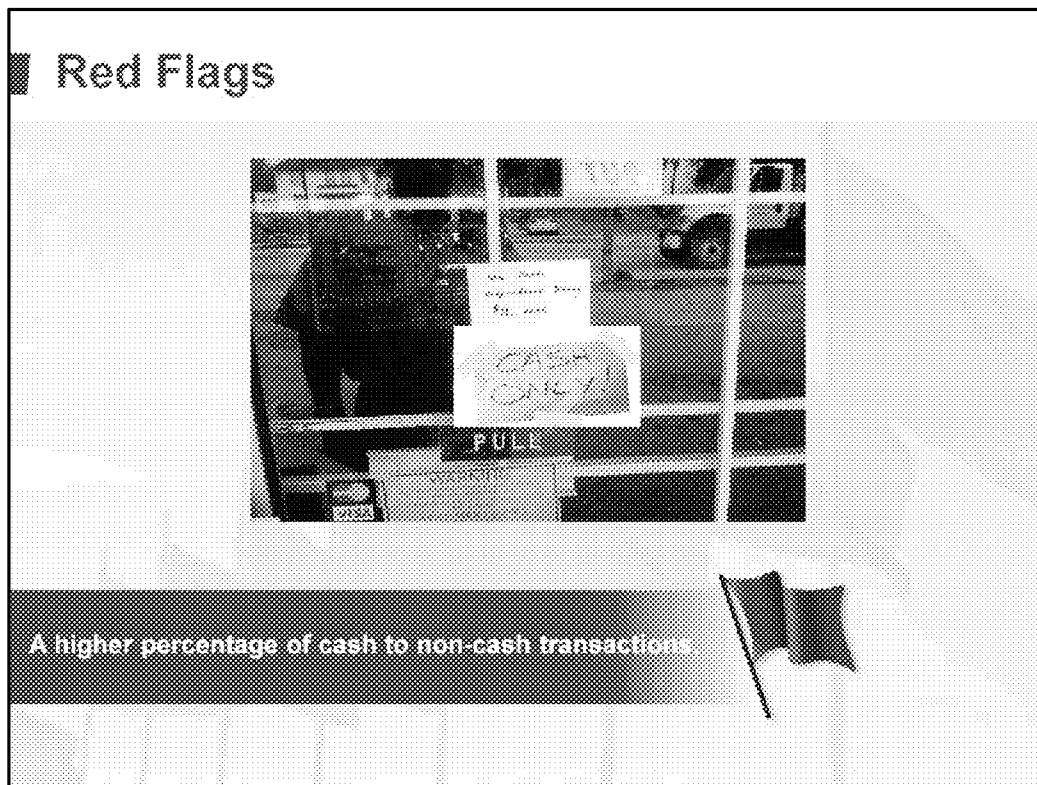


(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

**Time:** 32 seconds

**Narration:** You noticed many vehicles from out of state in the pharmacy parking lot. One AmerisourceBergen associate described how he observed the activities at a particular pharmacy. He saw several vehicles from Tennessee, West Virginia, and Virginia show up at the pharmacy, typically with more than one person in the vehicle, where the occupants of the vehicle would go in, fill a prescription and then head right back to the highway in the direction of their home state. It is atypical behavior to travel out of state for prescriptions.





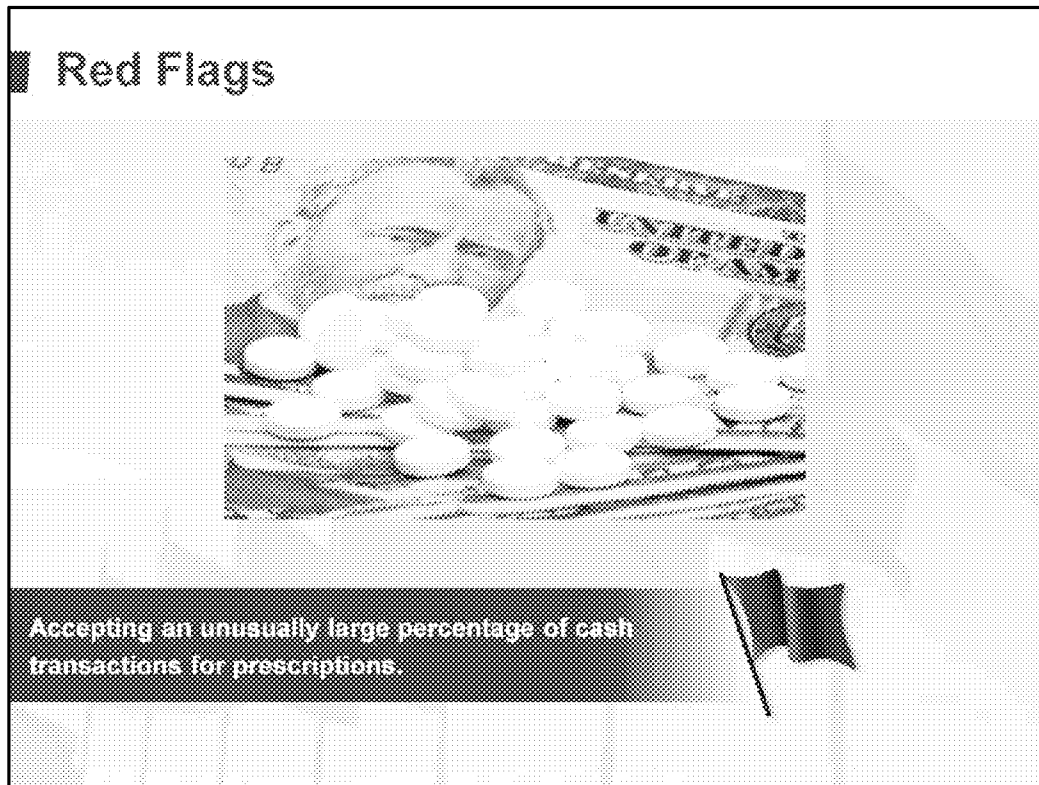
(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

**Time:** 55 seconds

**Narration:** Any sign or indication that the pharmacy is more interested in “selling” drugs, than “dispensing” drugs is a problem. In this example, the pharmacy is promoting the sale of Oxycodone 30 milligrams and cash transactions, both of which are red flags for possible diversion.

This is only one example. The problem of prescription drug diversion is dynamic. As a sales associate, you are face-to-face with the customer and you know best what a normal pharmacy operation looks like and are capable of identifying irregularities; it’s just a matter of identifying red flags as a part of your normal interaction and visit with the customer.

If you observe anything that you suspect may be related to drug diversion, even if you’re not sure, contact a member of the Diversion Control Team (DCT) at Corporate Security and Regulatory Affairs (CSRA’s) to relay that information. You can the following email address: “CSRAOMP@amerisourcebergen.com.” They will conduct the appropriate follow-up.



(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

**Time:** 10 seconds

**Narration:** Look around at the clientele. Do they resemble the clientele you would expect to meet at your local pharmacy? Are you noticing multiple cash transactions while you are there?



(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

**Time:** 42 seconds

**Narration:** Ask yourself the following questions while interacting with your customers. Are the doors and windows barred? Is there an armed guard? Is the pharmacy selling health and beauty aids, or are they just dispensing a specified volume of prescriptions? There may be reasonable explanations for any or all of these situations, but your role and obligation is to recognize the irregular activity and to report it to CSRA.

Our objective is to arm you with enough information so that you can carry out your job while still being the eyes and ears of the company's drug diversion control program. This should be a seamless process and if designed correctly, should not detract from your job.

## ■ Summary – Lesson 3: Red Flags

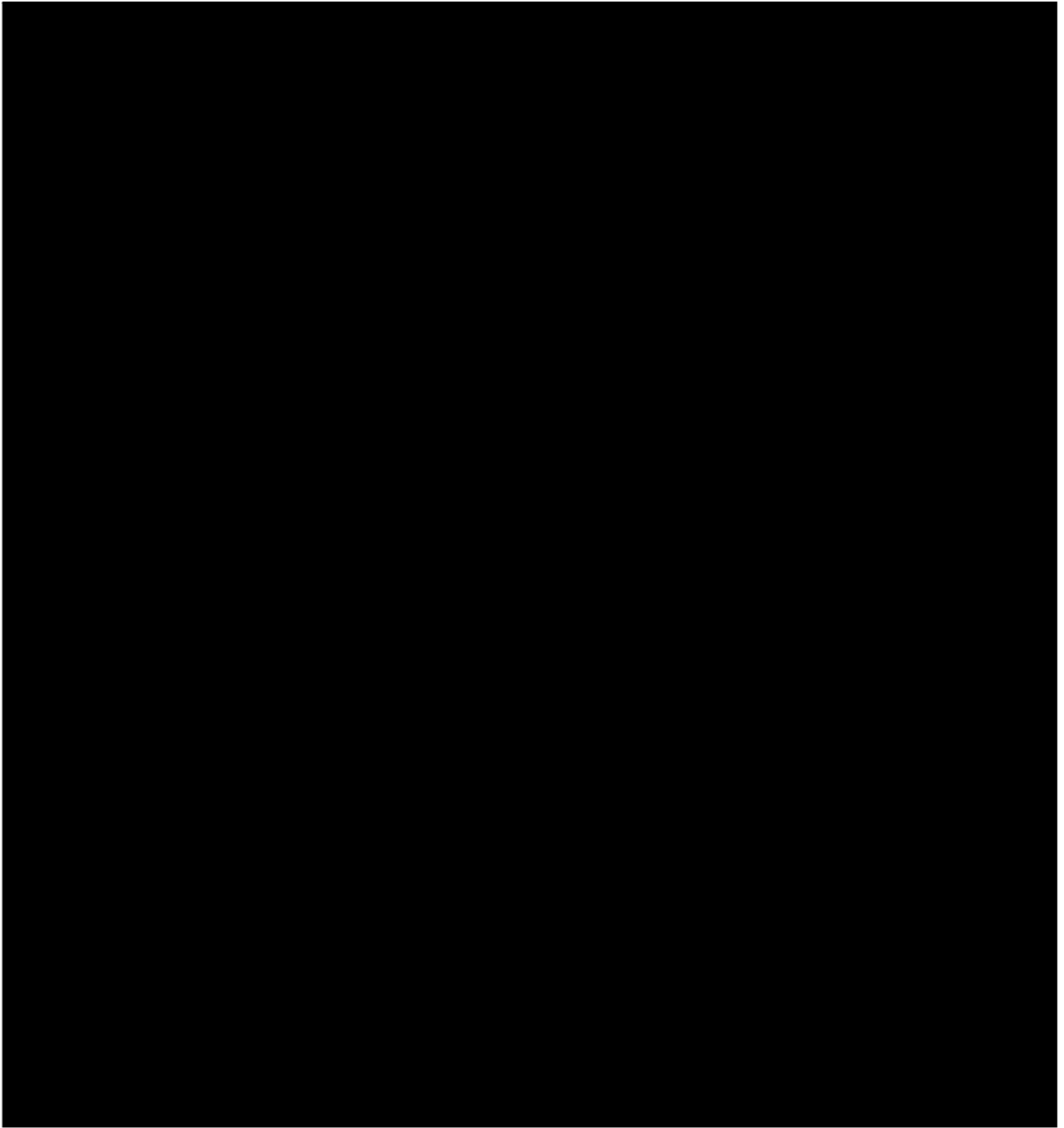
Red flags include:

- Long lines of patients standing outside a pharmacy waiting to fill controlled substance prescriptions
- Dispensing prescriptions to patients or from physicians not from local area
- Not selling health and beauty aids and only dispensing drugs
- Dispensing a high percentage of Oxycodone 30 mg prescriptions versus all other Oxycodone strengths being dispensed
- A high percentage of cash transactions
- Barred windows & doors
- An armed guard

**Time:** 11 seconds

**\*Total time: Slides 1-49:** 15 minutes, 32 seconds

**Narration:** This concludes Lesson 3: Red Flags. Read over the summary items. Once you are finished, we will move on to Lesson 4 – ABC's Drug Diversion Control Program.

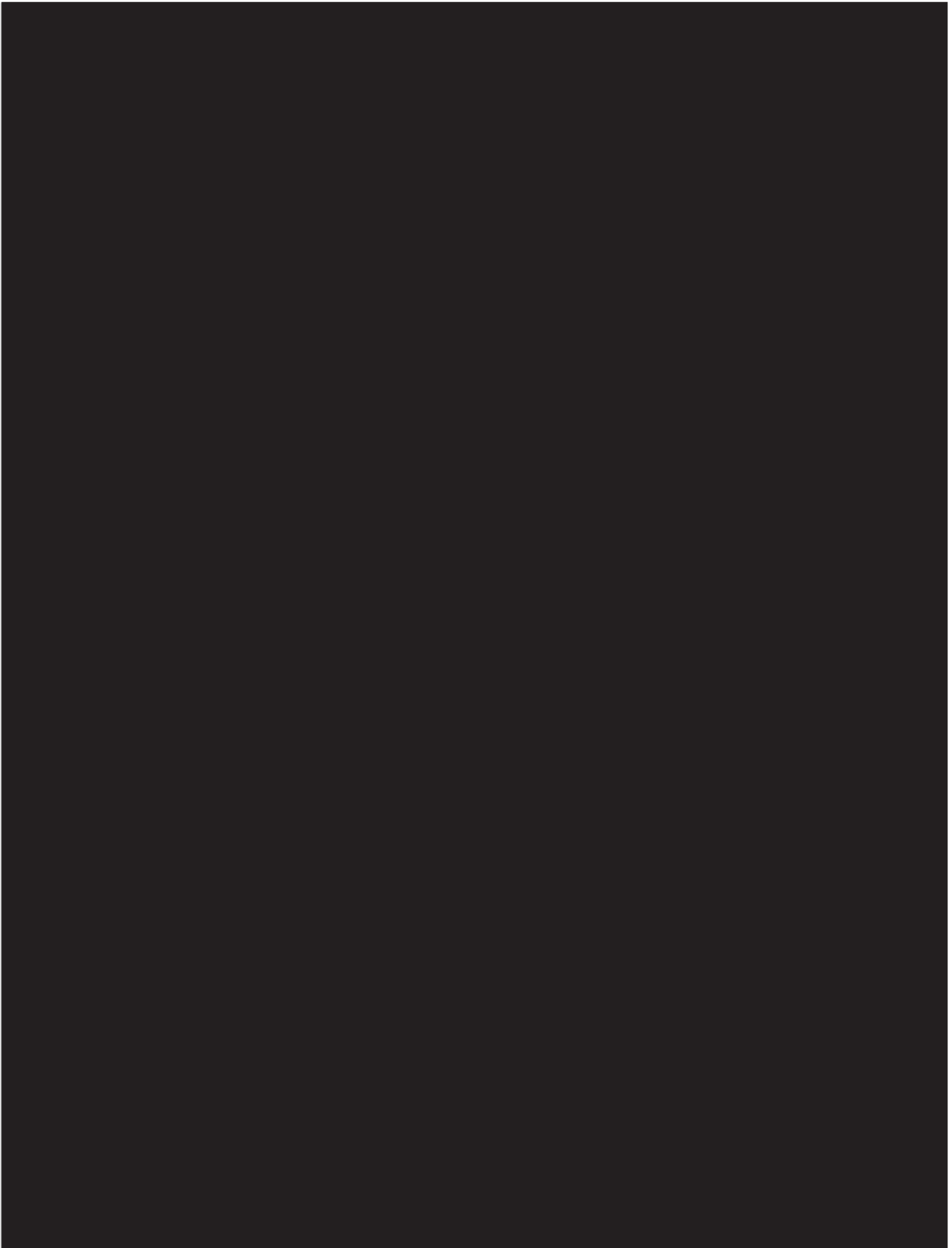










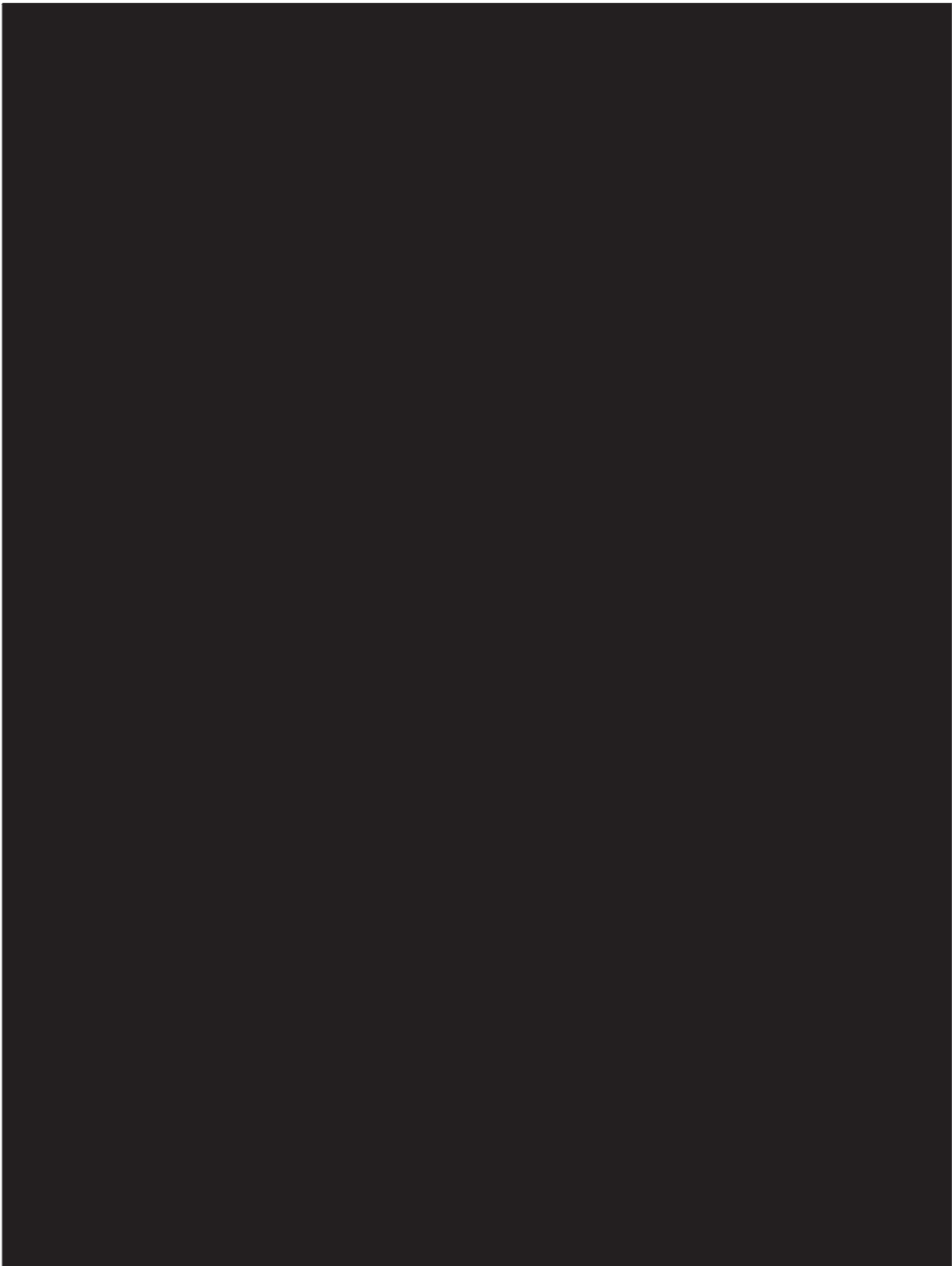




















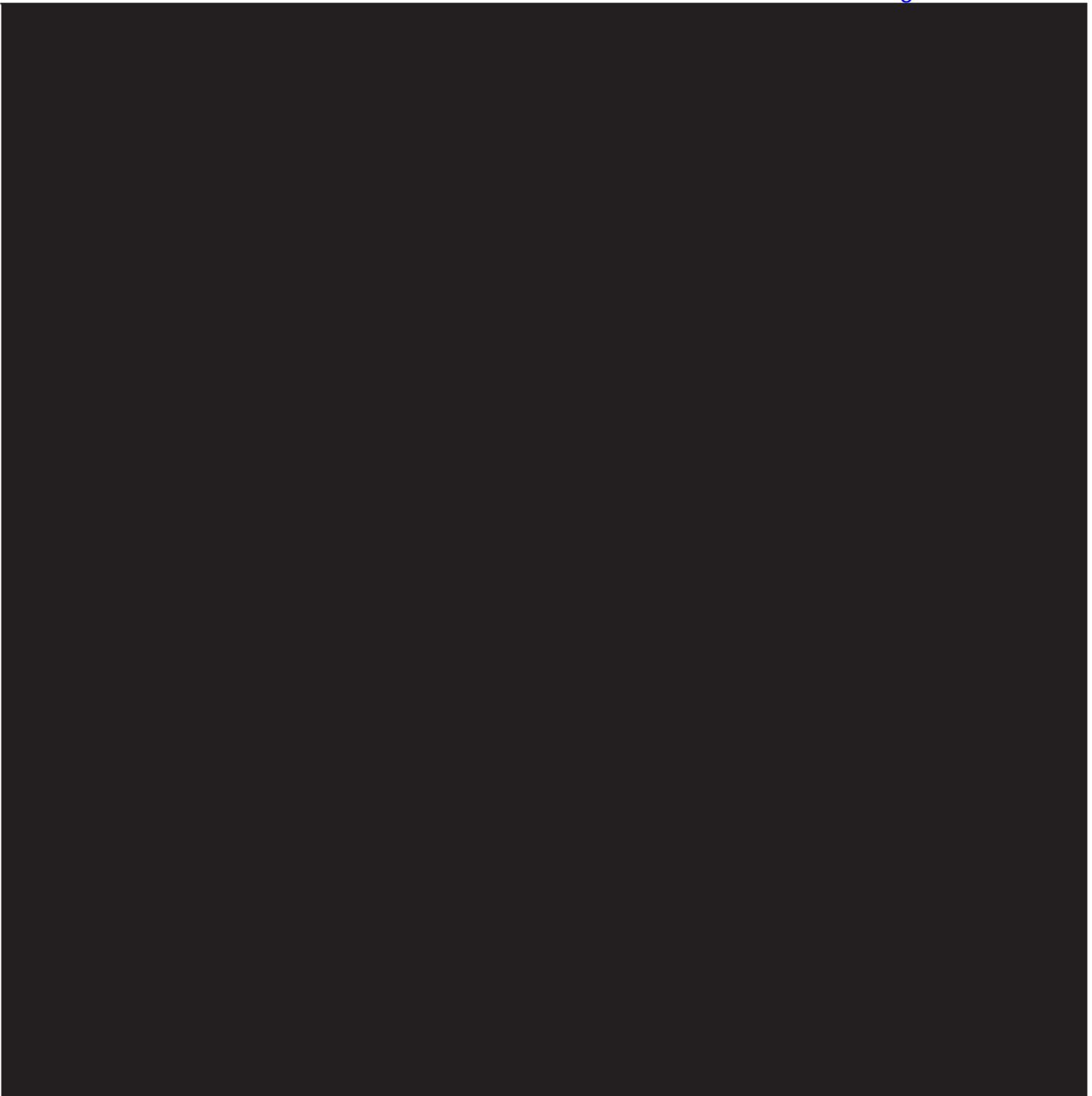














**Why are We Concerned about Prescription Drug Diversion?**

**It's the law!**

 U.S. DEPARTMENT OF JUSTICE ★ DRUG ENFORCEMENT ADMINISTRATION  
**DIVERSION CONTROL DIVISION**  
Title 21 – CSA Code of Federal Regulations

**21 CFR 1301.71(a)**  
"All applicants and registrants shall provide **effective controls and procedures** to guard against theft and diversion of controlled substances."

**21 CFR 1301.74**  
Requires that registrants design and operate a **system to identify suspicious orders** and report suspicious orders to DEA when discovered.

**Time:** 28 seconds


**Narration:**

So, why are we so concerned about prescription drug diversion? Well, the short answer is "it's the law!!" Recall the DEA's Title 21 Controlled Substance Act. AmerisourceBergen is a DEA registrant, and by law, must have controls and procedures in place to guard against theft and diversion of controlled substances, in addition to having systems in place to identify and report suspicious orders.

(Prod note: animate "It's the law!" in with audio)

# Why are We Concerned about Prescription Drug Diversion?

**It's the right thing to do!**

 **More than 650,000 opioid prescriptions are dispensed**

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**3,900 people initiating nonmedical use of prescription opioids**


Source: Opioid-related overdoses include those involving prescription opioids and illicit opioids, such as heroin. Source: IMS Health National Prescription Audit / SAMHSA National Survey on Drug Use and Health / CDC National Vital Statistics System (2015)

**\$55 billion in health and social costs related to prescription opioid abuse each year**

Source: Pain Med. 2011;13(4):657-671; 2012;14(10):1534-47; J. CDC. JAMA. 2015; 314(15): 2. CDC vital signs. 6/6/16 1487-1492

**2. Almost 3% of the U.S. population – aged 12 years or older had an illicit drug use disorder**

Source: SAMHSA National Survey on Drug Use and Health 2017

 **More than 33,000 people died of opioid overdose**

-----

**Since 1999, sales of prescription opioids have quadrupled**

Source: Center for Disease Control (CDC) July 2017

**Time: 13 seconds**

**Narration:**

More importantly, it's the right thing to do! Recall some of the statistics on drug abuse. The U.S. has an opioid problem and we at AmerisourceBergen must do our part to help.

(Prod note: animate “It’s the right thing to do!” in with audio)

## ■ Additional Resources – Websites



U.S. DEPARTMENT OF JUSTICE • DEPARTMENT OF JUSTICE  
DIVERSION CONTROL DIVISION

<https://www.deaiversion.usdoj.gov/>



Centers for Disease Control and Prevention  
CDC 24/7: Saving Lives. Protecting People™

<https://www.cdc.gov/>



<https://www.cdc.gov/vitalsigns/index.html>

**Time:** 12 seconds

**Narration:** To learn more about drug diversion and prescription drug abuse, visit the U.S. Department of Justice's DEA Diversion Control Division, the CDC, and Vital Signs websites.

## ■ “Red Flags” Video for Pharmacists

The “Red Flags” video uses real-life scenarios to educate pharmacists on how to identify the warning signs of prescription drug abuse and drug diversion when dispensing controlled substance prescriptions.

**Recommended Action Items:**

- Watch the video
- Provide the web address link to your pharmacy customers

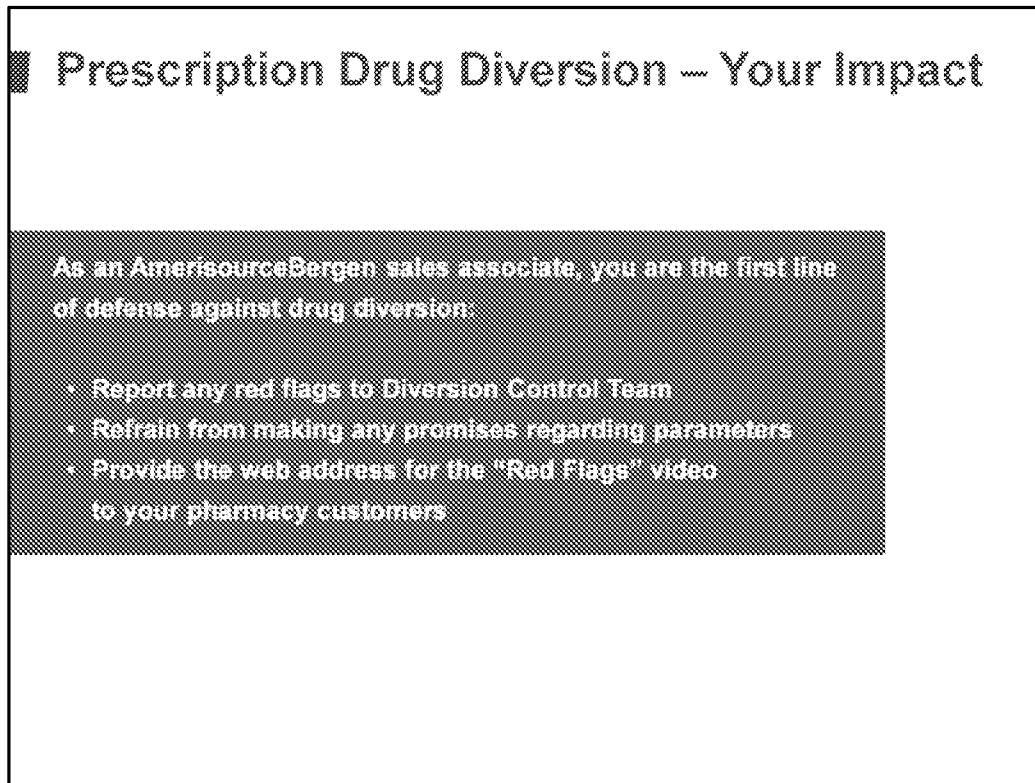


<https://nabp.pharmacy/initiatives/awarex/pharmacist-resources/>

**Time:** 48 seconds

**Narration:** The national association of boards of pharmacy, NABP, and the Anti-Diversion Industry Working Group, a consortium of pharmaceutical manufacturers and distributors including ABC, created “Red Flags” to educate pharmacists on how to identify the warning signs of prescription drug abuse and drug diversion when dispensing controlled substance prescriptions. It’s recommended that you view this video and become familiar with the red flags from the perspective of a pharmacist. It’s also recommended that you provide this link to your pharmacy customers, so they are aware of these red flags.

To view the video, click the web address link. Copy this link from the browser to provide it to your pharmacy customers.



**Time:** 24 seconds

**Narration:** As an AmerisourceBergen sales associate, you are the first line of defense against drug diversion.

Report any red flags to Diversion Control Team. Refrain from making any promises regarding parameters. Provide the web address for the “Red Flags” video to your pharmacy customers. You play a part to help us prevent prescription drug diversion.

(Prod note: this text is animated / synched to audio)





**Time:** 12 seconds

**Narration:** For a deeper understanding of drug diversion or if you have any questions that were not addressed by this training, feel free to contact AmerisourceBergen's experts for more information.

**Time:** 14 seconds

**\*Total time: Slides 1-73:** 26 minutes, 34 seconds

**Narration:** Once you view all of the slides and exit this course, be sure to complete the assessment in the Learning Portal. You will need a passing score of 80% to earn a completion status. Congratulations! You have finished the course portion of this training. It is now time to take the assessment.